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CONFIDENTIAL

51 CORPORATE WOODS, 9393 WEST 110TH STREET, OVERLAND PARK, KANSAS 66210 (913) 642-7100

March 27, 1985

EPA-ARWM/PMTS

APR 01 1985

Region VII K.C., MO

Mr. Lyndell Harrington
Permits Section, RCRA Branch
United States Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: Olin Water Services, KSD000203638

Dear Mr. Harrington:

This letter is in response to your March 1, 1985 letter requesting completion of the attached questionnaire addressing the continuing releases provision of the November 8, 1984 RCRA amendments. Please find enclosed the completed questionnaire and its attachments.

We hope the information supplied is sufficient to complete your review and proceed with the issuance of our RCRA Part B Permit.

Sincerely,

OLIN WATER SERVICES
OLIN CORPORATION

A handwritten signature in dark ink, appearing to read "Blaine M. Madsen".
Blaine M. Madsen
Director, Operations and
Business Development

BMM:gk A circular stamp containing the letters "AP" in a stylized font.
Attachments

cc: Mr. J. Goetz, KDHE



R00011232
RCRA Records Center

Discuss w/
KDHE "waste
recycling
operation"
described in
response to
SWMU?

INFORMATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Olin Water Services, Olin Corporation

EPA I.D. NUMBER: KSD000203638

LOCATION City Kansas City

State Kansas

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART B APPLICATION. HOWEVER, TANKS AND/OR CONTAINERS WHICH STORE HAZARDOUS WASTES FOR LESS THAN NINETY DAYS SHOULD BE INCLUDED.

	<u>YES</u>	<u>NO</u>
◦ Landfill	___	___
◦ Surface Impoundment	___	___
◦ Land Farm	___	___
◦ Waste Pile	___	___
◦ Incinerator	___	___
◦ Storage and/or Treatment Tank (Above Ground)	___	___
◦ Storage and/or Treatment Tank (Underground)	___	___
◦ Container Storage Area	___	___
◦ Injection Wells	___	___
◦ Wastewater Treatment Units	___	___
◦ Elementary Neutralization Units	___	___
◦ Transfer Stations	___	___
◦ Waste Recycling Operations	<u>X</u>	___

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular please focus on whether or not the wastes would be considered as hazardous wastes or solid wastes which contain hazardous constituents under RCRA. Also include any available data on quantities or volumes of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions, location of each unit on a topographic map and a site plan if available.

See Attached

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR 261.

For the units noted in Number 1 above and also those hazardous waste units in your Part B application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or still be occurring and any corrective measures or response which may have been taken.

Please provide the following information:

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, volatilization or release of air-borne wastes or constituents, etc)
- e. Describe nature and extent of any corrective measures or response to a release which was taken.

None


4. In regard to the prior releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil, groundwater, surface water or air.


None

Signature and Certification

As with reports in RCRA Permit Applications, submittal of this information must contain the following certification and signature by a principal executive officer of at least the level of Vice President or by a duly authorized representative of that person:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.


Signature

Blaine M. Madsen
Director, Operations and
Business Development 
Name and Title (Typed)

Olin WATER SERVICES

Attachment

In response to our affirmative answer to the Waste Recycling Operation question, we wish to offer this narrative:

First, since we are unclear as to whether our operation, as described below, would be considered a Waste Recycling Operation under the current regulation, we respectfully request the EPA to review and offer its position regarding this question.

Olin Water Services, during the calendar year 1984, placed into its waste records several discontinued, out of spec products that were determined to have no further use. Investigation revealed these materials could be reformulated into new or existing products. At that point the materials were removed and their movement documented in the Hazardous Waste Inventory Log Records. This is a type of practice that Olin Water Services feels will reoccur in the future and is requesting that the EPA offer its position as to whether the OWS practice of reworking this material into viable products is considered Waste Recycling under the current regulations.

Responding to specific points in question #2.

Yes, these materials would have been considered hazardous under RCRA. Below is a listing of the quantities of material that were removed and reformulated into new products. The reworking of these materials took place within the manufacturing operation located at 3155 Fiberglas Road, Kansas City, Kansas, specifically occurring in the various batch tanks used for product formulation. A copy of the manufacturing operation layout is attached.

Reworked waste

4,287 lbs.	D002 (corrosive)	1/5/84
484 lbs.	D007 (toxic)	2/3/84
484 lbs.	D007 (toxic)	5/21/84
484 lbs.	D007 (toxic)	5/23/84

Should you require additional information regarding our operations, please contact us.

Bram 3/27/85 *AP*

SITE PLAN

(270.14(b)(19))

Date: Current conditions
as of Sept 1984
Scale: 1 inch = 50 feet

N



SUNSHINE RD.

FIBERGLASS RD.

GLASS RD.

3155

GATE 2

